

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI**

CHARLES E. LAWSON, individually and )  
on behalf of all others similarly situated, )

Plaintiff, )

vs. )

Case No. 4:15-cv-00937-CDP

SQUARE TWO FINANCIAL SERVICES )  
CORPORATION d/b/a FRESH VIEW )  
SOLUTIONS, )

Defendant. )

**DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

In accordance with Federal Rule of Civil Procedure 56 and Local Rule 7-4.01, Defendant Square Two Financial Services Corporation moves for summary judgment on Plaintiff Charles E. Lawson’s single cause of action. In support of this Motion, Defendant files its Memorandum and Statement of Uncontroverted Material Facts.

WHEREFORE, Defendant respectfully requests that the Court enter summary judgment in its favor and against Plaintiff, dismiss the lawsuit with prejudice to future actions at Plaintiff’s costs, and grant such other relief as this Court deems just and proper under the circumstances.

DATED this 15th day of January, 2016.

Respectfully submitted,  
SPENCER FANE LLP

By: /s/ Joshua C. Dickinson

Joshua C. Dickinson, #51446MO  
12925 West Dodge Road, Suite 107  
Omaha, NE 68154  
(402) 965-8600 (telephone)  
(402) 965-8601 (facsimile)  
[jdickinson@spencerfane.com](mailto:jdickinson@spencerfane.com)

Patrick T. McLaughlin, #48633MO  
1 North Brentwood Blvd., Suite 1000  
St. Louis, MO 63105  
(314) 863-7733 (telephone)  
(314) 862-4656 (facsimile)  
[pmclaughlin@spencerfane.com](mailto:pmclaughlin@spencerfane.com)

*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was filed electronically with the United States District Court for the Eastern District of Missouri, this 15th day of January, 2016, with notice of case activity generated and sent electronically to:

Christopher E. Roberts  
David T. Butsch  
Butsch Roberts & Associates, LLC  
231 South Bemiston Avenue, Suite 260  
Clayton, MO 63105

Steven A. Donner  
Thomas R. Applewhite  
Donner Applewhite  
1108 Olive Street, Suite 200  
St. Louis, MO 63101

*Attorneys for Plaintiff*

/s/ Joshua C. Dickinson